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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First Named Applicant: Kitsukawa)	Art Unit: 2612
)	
Serial No.: 09/840,327)	Examiner: listed as "Shirley Lu" on
)	cover sheet of Answer and "Shirley
Filed: April 23, 2001)	Chang" in body of Answer
)	
For: INTERACTIVE TELEVISION SYSTEM)	50P4366
)	
)	June 20, 2006
)	750 B STREET, Suite 3120
)	San Diego, CA 92101

REPLY BRIEF

Commissioner of Patents and Trademarks

Dear Sir:

This responds to the Examiner's Answer dated June 16, 2006. The Answer concurs with the status of claims contained in the Appeal Brief (Claims 2-19 pending, Claims 1 and 20-33 canceled) and with the statement in the Appeal Brief of the grounds of rejection (limited to Claims 2-19), but then articulates rejections for canceled Claims 1 and 20-25.

The essence of the Answer is that Hsu, page 15, lines 10-35 and "in particular lines 10-16" teach automatically updating a web page associated with a virtual channel. This is inaccurate. First, lines 10-16 discuss displaying and storing an "object" associated with a link, with the object being downloaded from a server when a link is highlighted. Clearly, this teaches that a user must highlight a link before anything is downloaded, in contrast to the independent claims, which clearly specify that a virtual channel is updated

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without user interaction based on new content from the Web page that underlies or establishes the virtual channel.

Of perhaps more relevance are lines 18-22 of page 15, which state that "associated objects or graphics" can be downloaded at times of low usage. The question then becomes, what are the "objects or graphics" and with what are they associated? Page 14 provides the answer. On lines 21-24 it is divulged that "when a link is highlighted, an object such as a graphic image...is displayed on the television screen." Accordingly, the thing that is downloaded on page 15 (i.e., at times of low usage) is an object associated with a "link". But the claims are more specific. They require automatically updating web pages that establish virtual channels, whereas the entities downloaded at lines 18-22 of page 15 of Hsu are objects associated with, but not necessarily part of, a link. Furthermore, the links with which the relied-upon objects of Hsu, page 15 are associated do not appear to establish virtual channels. Instead, as clearly stated on page 12, beginning on line 9, the templates that show the links in figures 5 and 7 establish a "guide page"; it is the "guide page" that establishes a virtual channel, see, e.g., figure 8 (the guide page is channel 10) and page 16, lines 5-8, not the links. Importantly, the guide page is not itself a web page.

Appellant would also like to point out to the Board page 15, lines 26-29 of Hsu, which teaches that frequently visited web pages can be automatically updated and downloaded. However, there is no mention here that these "frequently visited web pages" establish virtual channels; indeed, they would appear to be pages that are simply the subjects of frequent hyperlinking. Accordingly, while page 16, lines 3-5 teach that web channels are provided on the TV, the only teachings on page 15 relating to automatically updating anything from the Internet relate to the links on the guide page. As shown above, neither the links nor the


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guide page itself are web pages as required by the claims, and furthermore the relied-upon links do not themselves establish virtual channels as claimed.

Respectfully submitted,



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